

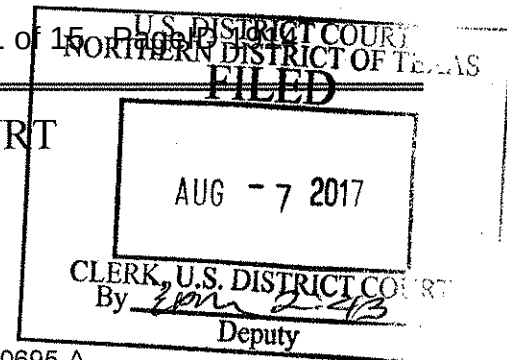
ORIGINAL

UNITED STATES DISTRICT COURT

for the
Northern District of Texas

Michelle Jackson
v.
BNSF Railway Company

Case No.: 4:16-CV-00695-A



BILL OF COSTS

Judgment having been entered in the above entitled action on 08/02/2017 against Plaintiff,
the Clerk is requested to tax the following as costs:

Fees of the Clerk	\$ 400.00
Fees for service of summons and subpoena	
Fees for printed or electronically recorded transcripts necessarily obtained for use in the case	2,597.22
Fees and disbursements for printing	
Fees for witnesses (itemize on page two)	0.00
Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case	466.09
Docket fees under 28 U.S.C. 1923	
Costs as shown on Mandate of Court of Appeals	
Compensation of court-appointed experts	
Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828	
TOTAL	\$ 3,463.31

SPECIAL NOTE: Attach to your bill an itemization and documentation for requested costs in all categories.

Declaration

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill has been served on all parties in the following manner:

☒ Electronic service ☐ First class mail, postage prepaid

☐ Other:

s/ Attorney:

Name of Attorney: Bryan P. Neal

For: BNSF Railway Company
Name of Claiming Party

Date: 08/03/2017

Taxation of Costs

Costs are taxed in the amount of _____ and included in the judgment.

By:

Clerk of Court

Deputy Clerk

Date

UNITED STATES DISTRICT COURT

Witness Fees (computation, cf. 28 U.S.C. 1821 for statutory fees)							
NAME , CITY AND STATE OF RESIDENCE	ATTENDANCE		SUBSISTENCE		MILEAGE		Total Cost Each Witness
	Days	Total Cost	Days	Total Cost	Miles	Total Cost	
							\$0.00
							\$0.00
							\$0.00
							\$0.00
							\$0.00
							\$0.00
					TOTAL		\$0.00

NOTICE

Section 1924, Title 28, U.S. Code (effective September 1, 1948) provides:

"Sec. 1924. Verification of bill of costs."

"Before any bill of costs is taxed, the party claiming any item of cost or disbursement shall attach thereto an affidavit, made by himself or by his duly authorized attorney or agent having knowledge of the facts, that such item is correct and has been necessarily incurred in the case and that the services for which fees have been charged were actually and necessarily performed."

See also Section 1920 of Title 28, which reads in part as follows:

"A bill of costs shall be filed in the case and, upon allowance, included in the judgment or decree."

The Federal Rules of Civil Procedure contain the following provisions:

RULE 54(d)(1)

Costs Other than Attorneys' Fees.

Unless a federal statute, these rules, or a court order provides otherwise, costs — other than attorney's fees — should be allowed to the prevailing party. But costs against the United States, its officers, and its agencies may be imposed only to the extent allowed by law. The clerk may tax costs on 14 day's notice. On motion served within the next 7 days, the court may review the clerk's action.

RULE 6

(d) Additional Time After Certain Kinds of Service.

When a party may or must act within a specified time after service and service is made under Rule 5(b)(2)(C), (D), (E), or (F), 3 days are added after the period would otherwise expire under Rule 6(a).

RULE 58(e)

Cost or Fee Awards:

Ordinarily, the entry of judgment may not be delayed, nor the time for appeal extended, in order to tax costs or award fees. But if a timely motion for attorney's fees is made under Rule 54(d)(2), the court may act before a notice of appeal has been filed and become effective to order that the motion have the same effect under Federal Rule of Appellate Procedure 4(a)(4) as a timely motion under Rule 59.

ITEMIZATION
(Attachment to Bill of Costs, Form AO 133)

I. Fees of the clerk (see attached Exhibit 1)

1.	Filing fee for Notice of Removal	\$ 400.00
Total fees of the clerk		<u>\$400.00</u>

I. Fees for printed or electronically recorded transcripts necessarily obtained for use in the case (see attached Exhibit 2)

1.	Veritext Deposition transcript of Kelli Courreges*	\$ 500.97
2.	Veritext Deposition transcript of Carrie Whitman*	\$ 685.40
3.	Veritext Deposition transcript of Michelle Jackson*	\$1,410.85
Total fees for court reporter and transcripts.		<u>\$ 2,597.22</u>

* Miscellaneous fees deducted

II. Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case (see attached Exhibit 3)

1.	<u>Photocopy fees incurred in-house at Thompson & Knight LLP</u>	
	07/25/16 - 06/22/17 891 copies at \$.10	\$ 89.10
	06/22/17 358 color copies at \$.75	268.50
2.	Texas Workforce Commission Fee for copy of records regarding Michelle Jackson's charge of discrimination	20.60
3.	Records Deposition Service Medical records fee for records regarding Michelle Jackson maintained by Texas Health Harris Methodist Hospital HEB	87.89

Total fees for exemplification/copying \$ 466.09

DEFENDANT'S TOTAL COSTS..... \$ 3,463.31

From: paygovadmin@mail.doc.twal.gov
To: [Rodgers, Sherri](#)
Subject: Pay.gov Payment Confirmation: TXND CM ECF
Date: Friday, July 22, 2016 1:26:10 PM

Your payment has been submitted to [Pay.gov](#) and the details are below. If you have any questions or you wish to cancel this payment, please contact the U.S. District Court of Northern Texas at (214) 753-2240.

Application Name: TXND CM ECF
[Pay.gov](#) Tracking ID: 25STI5S5
Agency Tracking ID: 0539-7745293
Transaction Type: Sale
Transaction Date: Jul 22, 2016 2:25:01 PM

Account Holder Name: Tauncia L. Franklin
Transaction Amount: \$400.00
Card Type: AmericanExpress
Card Number: *****2002

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

EXHIBIT 1

Law Firm Invoice ID: 3018915

Veritext
 Please Remit Payment to:
 P.O BOX 71303
 Chicago, IL 60694
 UNITED STATES
 Phone#: 973-410-4032
 Tax ID: 20-3457913

BNSF Railway Company

Invoice Date: 06/29/2017 (mm/dd/yyyy)
 Counsellink Invoice ID: 63376471
 Law Firm Matter ID: Veritext-BNSF

Regarding:

Matter Authorization #: EM-2220
 Matter Title: Jackson, Michelle

Matter Contact: Ritchie, Carolyn
 Assigning Office: Employment
 2500 LOU MENK DR

FT WORTH, TX 76131

Invoice Description:

Transmit to SAP:
 Voucher # (SAP Doc #):
 Payment Doc #:

Hourly

EXPENSES Date (mm/dd/yyyy)	Timekeeper	Charge Text	Units	Rate (USD)	Adj. (USD)	Inv. Adj. (USD)	Tax (USD)	Net (USD)
06/08/2017	None	Litigation Support Vendors - Administration Fee FOR WITNESS Kelli Courreges	1	\$58.00	\$0.00	\$0.00	\$0.00 (0%)	\$58.00
06/08/2017	None	Litigation Support Vendors - Certified Transcript FOR WITNESS Kelli Courreges	89	\$2.75	\$0.00	\$0.00	\$0.00 (0%)	\$244.75
06/08/2017	None	Litigation Support Vendors - Electronic Delivery and Handling FOR WITNESS Kelli Courreges	1	\$28.00	\$0.00	\$0.00	\$0.00 (0%)	\$28.00
06/08/2017	None	Litigation Support Vendors - Exhibits Scanned-Searchable - OCR FOR WITNESS Kelli Courreges	71	\$0.50	\$0.00	\$0.00	\$0.00 (0%)	\$35.50
06/08/2017	None	Litigation Support Vendors - Litigation Package FOR WITNESS Kelli Courreges	1	\$30.00	\$0.00	\$0.00	\$0.00 (0%)	\$30.00
06/08/2017	None	Litigation Support Vendors - Transcript - Expedited Fee FOR WITNESS Kelli Courreges	89	\$2.48	\$0.00	\$0.00	\$0.00 (0%)	\$220.72

INVOICE SUMMARY

	(USD)
Fees:	\$0.00
Expenses:	\$616.97
Sub-Total:	\$616.97
Discounts, Credits:	\$0.00
Client Adjustments:	\$0.00
Fees Tax:	\$0.00
Expense Tax:	\$0.00
Cost share:	\$0.00
Net:	\$616.97
Prompt Pay:	\$0.00
Wasting Overage:	\$0.00
Total :	\$616.97

CUMULATIVE SUMMARY

	(USD)
Total Fees to Date:	\$0.00
Total Expenses to Date:	\$616.97

Law Firm Invoice ID: 3018913

Veritext
 Please Remit Payment to:
 P.O BOX 71303
 Chicago, IL 60694
 UNITED STATES
 Phone#: 973-410-4032
 Tax ID: 20-3457913

BNSF Railway Company

Invoice Date: 06/29/2017 (mm/dd/yyyy)
 CounselLink Invoice ID: 63376470
 Law Firm Matter ID: Veritext-BNSF

Regarding:

Matter Authorization #: EM-2220
 Matter Title: Jackson, Michelle

Matter Contact: Ritchie, Carolyn
 Assigning Office: Employment
 2500 LOU MENK DR

FT WORTH, TX 76131

Invoice Description:

Transmit to SAP:
 Voucher # (SAP Doc #):
 Payment Doc #:

Hourly

EXPENSES								
Date	Timekeeper	Charge Text	Units	Rate	Adj.	Inv.	Tax	Net
(mm/dd/yyyy)				(USD)	(USD)	(USD)	(USD)	(USD)
06/09/2017	None	Litigation Support Vendors -	1	\$58.00	\$0.00	\$0.00	\$0.00	\$58.00
		Administration Fee FOR WITNESS					(0%)	
		Carrie Whitman						
06/09/2017	None	Litigation Support Vendors -	130	\$2.75	\$0.00	\$0.00	\$0.00	\$357.50
		Certified Transcript FOR					(0%)	
		WITNESS Carrie Whitman						
06/09/2017	None	Litigation Support Vendors -	1	\$28.00	\$0.00	\$0.00	\$0.00	\$28.00
		Electronic Delivery and					(0%)	
		Handling FOR WITNESS Carrie						
		Whitman						
06/09/2017	None	Litigation Support Vendors -	11	\$0.50	\$0.00	\$0.00	\$0.00	\$5.50
		Exhibits Scanned-Searchable -					(0%)	
		OCR FOR WITNESS Carrie Whitman						
06/09/2017	None	Litigation Support Vendors -	1	\$30.00	\$0.00	\$0.00	\$0.00	\$30.00
		Litigation Package FOR WITNESS					(0%)	
		Carrie Whitman						
06/09/2017	None	Litigation Support Vendors -	130	\$2.48	\$0.00	\$0.00	\$0.00	\$322.40
		Transcript - Expedited Fee FOR					(0%)	
		WITNESS Carrie Whitman						

INVOICE SUMMARY

(USD)
 Fees: \$0.00
 Expenses: \$801.40
 Sub-Total: \$801.40
 Discounts, Credits: \$0.00
 Client Adjustments: \$0.00
 Fees Tax: \$0.00
 Expense Tax: \$0.00
 Cost share: \$0.00
 Net: \$801.40
 Prompt Pay: \$0.00
 Wasting Overage: \$0.00
 Total : \$801.40

CUMULATIVE SUMMARY

(USD)
 Total Fees to Date: \$0.00
 Total Expenses to Date: \$801.40

Law Firm Invoice ID: 3013219

Veritext
 Please Remit Payment to:
 P.O BOX 71303
 Chicago, IL 60694
 UNITED STATES
 Phone#: 973-410-4032
 Tax ID: 20-3457913

BNSF Railway Company

Invoice Date: 06/26/2017 (mm/dd/yyyy)
 Counsellink Invoice ID: 63376469
 Law Firm Matter ID: Veritext-BNSF

Regarding:

Matter Authorization #: EM-2220
 Matter Title: Jackson, Michelle

Matter Contact: Ritchie, Carolyn
 Assigning Office: Employment
 2500 LOU MENK DR
 FT WORTH, TX 76131

Invoice Description:

Transmit to SAP:
 Voucher # (SAP Doc #):
 Payment Doc #:

Hourly

EXPENSES								
Date	Timekeeper	Charge Text	Units	Rate	Adj.	Inv.	Tax	Net
(mm/dd/yyyy)				(USD)	(USD)	(USD)	(USD)	(USD)
06/02/2017	None	Litigation Support Vendors - Exhibits FOR WITNESS Michelle Jackson	125	\$0.35	\$0.00	\$0.00	\$0.00 (0%)	\$43.75
06/02/2017	None	Litigation Support Vendors - Original with 1 Certified Transcript FOR WITNESS Michelle Jackson	217	\$4.20	\$0.00	\$0.00	\$0.00 (0%)	\$911.40
06/02/2017	None	Litigation Support Vendors - Shipping & Handling FOR WITNESS Michelle Jackson	3	\$29.50	\$0.00	\$0.00	\$0.00 (0%)	\$88.50
06/02/2017	None	Litigation Support Vendors - Transcript - Expedited Fee FOR WITNESS Michelle Jackson	217	\$2.10	\$0.00	\$0.00	\$0.00 (0%)	\$455.70

INVOICE SUMMARY

(USD)
 Fees: \$0.00
 Expenses: \$1,499.35
 Sub-Total: \$1,499.35
 Discounts, Credits: \$0.00
 Client Adjustments: \$0.00
 Fees Tax: \$0.00
 Expense Tax: \$0.00
 Cost share: \$0.00
 Net: \$1,499.35
 Prompt Pay: \$0.00
 Wasting Overage: \$0.00
 Total: \$1,499.35

CUMULATIVE SUMMARY

(USD)
 Total Fees to Date: \$0.00
 Total Expenses to Date: \$1,499.35

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Work Date	Description	Qty	Rate	Amount	Matter No.	Matter Name
5/31/2017	Copy Charges	431.00	0.10	\$43.10	031432.000601	Jackson v. BNSF
5/31/2017	Copy Charges	142.00	0.10	\$14.20	031432.000601	Jackson v. BNSF
5/26/2017	Copy Charges	185.00	0.10	\$18.50	031432.000601	Jackson v. BNSF
7/25/2016	Copy Charges	63.00	0.10	\$6.30	031432.000601	Jackson v. BNSF
6/22/2017	Copy Charges	70.00	0.10	\$7.00	031432.000601	Jackson v. BNSF
6/22/2017	Color Copies	358.00	0.75	\$268.50	031432.000601	Jackson v. BNSF
	Total:			\$357.60		

EXHIBIT 3



**Texas Workforce Commission
Austin, Texas
Open Records - Invoice**

Client Mailing Address:

Sherri L. Rodgers
Thompson & Knight LLP
One Arts Plaza
1722 Routh Street, Suite 1500

Invoice Address (if other than client address):

Dallas TX 75201-2533

Request Order #: 170414-005

450-2016-03502

Subject Reference: Michelle Jackson

Date Information Released:

Request Rec'd Date: 4/14/2017

Invoice Date: 4/27/2017

Total Charges: \$20.60

Amount Paid: \$0.00


Date Paid:

Balance Due: \$20.60

Comment

Make Payable To: Texas Workforce Commission
Revenue And Trust Management
P.O. Box 877
Austin, Texas 78767
Questions To: Elsa Guerrero

TDD 1-800-735-2989
TWC's FEIN: 74-2764775
RTI Code: 171415
Phone #: 512-463-2420
Fax #: 512-463-2990

 **Cut here and return bottom portion with payment**

Please return this portion with payment

Please include Request Job 170414-005 on your check by: 5/12/2017

Previously Paid: \$0.00 Balance Due: \$20.60 Amount Paid: _____

Payment From:

Requester Name: Sherri L. Rodgers
Street Address 1: One Arts Plaza
Street Address 2: 1722 Routh Street, Suite 1500
Street Address 3:
City: Dallas State: TX Zip 75201-2533

Send Payment To:

Texas Workforce Commission
Revenue And Trust Management
P.O. Box 877
Austin, Texas 78767

Assigned To: Elsa Guerrero

Itemized Search Items

Civil Right Division (stored remotely)

staff labor time at \$18 plus 10

Pages: 11	@\$0.10 /page	\$1.10
Units: 0	@\$0.00 /Unit	\$0.00
Labor Hours: .25	@\$18.00/hr	\$4.50
	Manually Entered Charges:	\$0.00
	Total for Search Item:	\$5.60

Certification Charges

Certification Charges

Pages: 0	@\$0.00 /page	\$0.00
Units: 1	@\$15.00 first unit + @\$5.00 /add'l Units	\$15.00
Labor Hours: 0	@\$0.00/hr	\$0.00
	Manually Entered Charges:	\$0.00
	Total for Search Item:	\$15.00

Please mail your payment of the Balance Due Amount to the address listed above. Please reference the TWC Request # listed above on your payment. Failure to properly identify payment will result in delays.

Records will be mailed to the Client Mailing address listed above upon receipt of payment unless you schedule an appointment to pick-up records with the individual listed above. Records will not be released until full payment is received.

THOMPSON & KNIGHT LLP1722 ROUTH STREET, SUITE 1500
DALLAS, TEXAS 75201-2533

Amegy Bank

05/08/2017

CHECK DATE

10232614

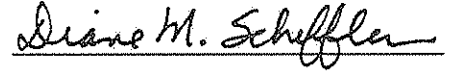
D

35-1125
1130**PAY Twenty and 60/100 Dollar(s)**

*****20.60

TO THE
ORDER
OFTexas Workforce Commission
Revenue and Trust Management
P O Box 877
Austin, TX 78767

THOMPSON & KNIGHT LLP

TWO SIGNATURES REQUIRED OVER \$25,000
VOID AFTER 90 DAYS*Re: Request Order #170414-005*

⑈ 10232614 ⑈ ⑆ 113011258 ⑆ 0054024265 ⑈

HOLD BACK OF DOCUMENT UNDER BLACK LIGHT TO VERIFY AUTHENTICITY

THOMPSON & KNIGHT LLP	10063929-7	Texas Workforce Commission	05/08/2017	10232614
INVOICE DATE	INVOICE NO	VOUCHER #	NET AMOUNT	INVOICE AMOUNT
04/27/2017	04272017	1097174	20.60	20.60

TOTAL CHECK

20.60

Attn: Sherri

INVOICE FOR RELEASE OF INFORMATION

TEXAS HEALTH RESOURCES
612 E. Lamar Blvd. Ste 800
Arlington, TX 76011

Patient: JACKSON, MICHELLE LAVON [E6852337]

THOMPSON & KNIGHT LLP [800231492]
1722 Routh Street, Suite 1500
Dallas, TX 75201

Billing Date: 5/30/17

Invoice Number: 86709

Paper.....	16				
Flat Fee				\$	45.74
Pages 11-60.....		6 X	\$	1.54	\$ 9.24

Additional Fee.....: \$ 26.00

Details:

Rush.....	\$	25.00 (Non-taxable)
Affidavit....	\$	1.00 (Non-taxable)

Postage.....	\$	6.91
Total Fee.....	\$	87.89
Amount Paid.....	\$	0.00

AMOUNT DUE.....: \$ 87.89

Please make check payable to:

Attn: Health Information Management Dept/ROI
TEXAS HEALTH RESOURCES
P.O. BOX 732521
DALLAS, TX 75373-2521

Tax ID: 75-2702388

This charge is for Medical Records ONLY. For Billing Records, please call our Central Billing Office at (682) 236-3000